

Dear Judge Goodman:

Consistent with Your Honor's instructions, Defendant Valeant Pharmaceuticals International, Inc. ("Valeant"), Defendant PricewaterhouseCoopers LLP ("PwC"), Class Plaintiff City of Tucson, and the Direct Action Plaintiffs¹ (the "Parties") write in response to your August 27, 2021 Order (ECF No. 834) to provide a joint status report regarding the outstanding objections currently pending before Your Honor, and the status of briefing for each, in the Securities Class Action, *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*, No. 15-cv-07658 (MAS) (LHG) and related Direct Actions.

	<u>Motion</u>	<u>Status</u>	<u>Relevant Docket Numbers</u>
1	Defendants' objection to the January 28, 2021 order of the Special Master (ECF No. 653) denying an extension of the schedule ²	Objection fully briefed as of March 3, 2021 and currently pending before Magistrate Judge Goodman.	<i>See</i> ECF Nos. 666, 686, 687, 688, 697
2	Defendants' objection to the April 12, 2021 report and recommendation of the Special Master (ECF No. 736) granting in part and denying in part Plaintiffs' motion regarding the sufficiency of certain responses and objections to plaintiffs' first set of requests for admission	Objection fully briefed as of May 17, 2021 and currently pending before Magistrate Judge Goodman.	<i>See</i> ECF Nos. 669, 670, 703, 713, 755, 761

¹ The Direct Action Plaintiffs are parties to the following cases: 16-cv-07321; 16-cv-07324; 16-cv-07494; 16-cv-07496; 17-cv-06513; 17-cv-07636; 17-cv-12088; 18-cv-00089; 18-cv-00343; 18-cv-00383; 18-cv-00846; 18-cv-00893; 18-cv-01223; 18-cv-08595; 18-cv-08705; 18-cv-15286; 18-cv-17393; 20-cv-02190; 20-cv-05478; 20-cv-07460; and 20-cv-07462.

² Defendants believe that much of the relief sought in this objection has since been effectively mooted through subsequent schedule extensions and that no action is required on this objection at this time. Plaintiffs believe that this objection is moot given subsequent developments. The Parties anticipate that the undecided scheduling issues will be addressed by the Special Master in the anticipated scheduling order. *See* Aug. 18, 2021 Hearing Tr. at 9:22-10:13. To the extent there remains any issue after the Special Master issues the scheduling order, Defendants would raise those issues separately.

	<u>Motion</u>	<u>Status</u>	<u>Relevant Docket Numbers</u>
3	Valeant's objection to the June 24, 2021 report and recommendation of the Special Master (ECF No. 780) granting Plaintiffs' motion to overrule Valeant's privilege and work product claims with respect to documents produced by FTI Consulting, Inc.	Objection fully briefed as of August 12, 2021 and currently pending before Magistrate Judge Goodman.	<i>See</i> ECF Nos. 671, 672, 673, 674, 701, 715, 716, 791, 808, 809, 815
4	Valeant's objection to the July 7, 2021 report and recommendation of the Special Master (ECF No. 788) denying Valeant's motion for a protective order to preclude the deposition of Joseph C. Papa	Objection fully briefed as of August 18, 2021 and currently pending before Magistrate Judge Goodman.	<i>See</i> ECF Nos. 699, 700, 717, 722, 801, 813, 824
5	Valeant's objection to the July 22, 2021 report and recommendation of the Special Master (ECF No. 798) granting Plaintiffs' motion to overrule Valeant's privilege and work product claims with respect to documents produced by Vianovo	Objection fully briefed as of September 2, 2021 and currently pending before Magistrate Judge Goodman.	<i>See</i> ECF Nos. 747, 748, 750, 759, 765, 816, 832, 838

The Parties are available at the Court's convenience to discuss any of the pending objections and any questions Your Honor may have.

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